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January 31, 2025

Via ECF

The Honorable Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse, S.D.N.Y.
500 Pearl Street
New York, NY 10007

RE: *Vinci Brands, LLC v. Coach, Inc., et al.*, No. 1:23-cv-05138-LGS-VF
Case-Mate's Letter Motion to Seal

Dear Judge Figueredo:

Pursuant to Rule I.g.2 of Your Honor's Individual Practices in Civil Cases, Case-Mate, Inc. ("Case-Mate") respectfully requests Your Honor's approval to file under seal ACS008434 as referenced in Case-Mate's January 31, 2025 Letter Regarding Deficient Discovery Responses by Candlewood Partners, LLC; ACS Acquisitions Group LLC; Vinci Brands, LLC; and Onward Brands, LLC (the "Deficiency Letter"). Case-Mate designates this document as Exhibit B to the Deficiency Letter.

Case-Mate seeks to file Exhibit A under seal to allow ACS Acquisitions Group LLC ("ACS") an opportunity to permanently seal it as it is a document that has been marked Confidential by ACS pursuant to the Stipulation and Confidentiality Agreement and Order [ECF 233] (the "Confidentiality Stipulation").

To ensure its compliance with the Confidentiality Stipulation, Exhibit B is submitted with this Letter Motion to Seal for the Court's consideration.

We thank the Court for its attention to this matter.

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 2/4/25

Parties interested in permanently sealing Exhibits A and B are directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by **February 24, 2025**.

Respectfully submitted,

/s/ Erika C. Birg
Erika C. Birg
(Counsel for Case-Mate, Inc.)